FILED 1 CLERK, U.S. DISTRICT COURT 4/28/2023 2 CENTRAL DISTRICT OF CALIFORNIA BY: \_\_\_\_\_ DEPUTY 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA 10 January 2023 Grand Jury 11 UNITED STATES OF AMERICA, CR 2:23-cr-00203-JFW 12 Plaintiff,  $\underline{\mathsf{I}} \ \underline{\mathsf{N}} \ \underline{\mathsf{D}} \ \underline{\mathsf{I}} \ \underline{\mathsf{C}} \ \underline{\mathsf{T}} \ \underline{\mathsf{M}} \ \underline{\mathsf{E}} \ \underline{\mathsf{N}} \ \underline{\mathsf{T}}$ 13 [21 U.S.C. §§ 841(a)(1), V. (b)(1)(C): Distribution of 14 DOMINICK KINGDIAMOND ALVARADO, Fentanyl Resulting in Death; 21 aka "Dom," U.S.C.  $\S$ \$ 841(a)(1), 15 (b) (1) (B) (vi), (b) (1) (C): aka "dominick 818," Possession with Intent to 16 Distribute Fentanyl; 21 U.S.C. Defendant. \$\$ 841(a)(1), (b)(1)(C): 17 Possession with Intent to Distribute Cocaine; 18 21 U.S.C. § 853: Criminal Forfeiture 19 20 The Grand Jury charges: 21 COUNT ONE 22 [18 U.S.C. §§ 841(a)(1), (b)(1)(C)] 23 On or about July 11, 2022, in Los Angeles County, within the 24 Central District of California, defendant DOMINICK KINGDIAMOND 25 ALVARADO, also known as ("aka") "Dom," aka "Dominick 818," knowingly 26 and intentionally distributed N-phenyl-N-[1-(2-phenylethyl)-4-27 piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug 28

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1 COUNT TWO

[18 U.S.C.  $\S\S$  841(a)(1), (b)(1)(C)]

On or about July 23, 2022, in Los Angeles County, within the Central District of California, defendant DOMINICK KINGDIAMOND ALVARADO, also known as ("aka") "Dom," aka "Dominick\_818," knowingly and intentionally distributed N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance, the use of which resulted in the death and serious bodily injury of victim A.D.

1 COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about August 1, 2022, in Los Angeles County, within the Central District of California, defendant DOMINICK KINGDIAMOND ALVARADO, also known as ("aka") "Dom," aka "Dominick\_818," knowingly and intentionally possessed with intent to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

COUNT FOUR [21 U.S.C. §§ 841(a)(1), (b)(1)(C)] On or about August 1, 2022, in Los Angeles County, within the Central District of California, defendant DOMINICK KINGDIAMOND ALVARADO, also known as ("aka") "Dom," aka "Dominick 818," knowingly and intentionally possessed with intent to distribute cocaine, a Schedule II narcotic drug controlled substance. 

COUNT FIVE

[21 U.S.C.  $\S\S$  841(a)(1), (b)(1)(B)(vi)]

On or about August 2, 2022, in Los Angeles County, within the Central District of California, defendant DOMINICK KINGDIAMOND ALVARADO, also known as ("aka") "Dom," aka "Dominick\_818," knowingly and intentionally possessed with intent to distribute at least 40 grams, that is, approximately 87.92 grams, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

COUNT SIX [21 U.S.C. §§ 841(a)(1), (b)(1)(C)] On or about August 2, 2022, in Los Angeles County, within the Central District of California, defendant DOMINICK KINGDIAMOND ALVARADO, also known as ("aka") "Dom," aka "Dominick 818," knowingly and intentionally possessed with intent to distribute cocaine, a Schedule II narcotic drug controlled substance. 

FORFEITURE ALLEGATION

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[21 U.S.C. § 853]

- Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, in the event of defendant's conviction of the offenses set forth in any of Counts One and Two of this Indictment.
- 2. Defendant, if so convicted, shall forfeit to the United States of America the following:
- a. All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which defendant obtained, directly or indirectly, from any such offense;
- b. All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense; and
- To the extent such property is not available for C. forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).
- 3. Pursuant to Title 21, United States Code, Section 853(p), defendant, if so convicted, shall forfeit substitute property if, by any act or omission of defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in

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value; or (e) has been commingled with other property that cannot be 1 2 divided without difficulty. 3 A TRUE BILL 4 5 /s/ Foreperson 6 7 E. MARTIN ESTRADA United States Attorney 8 MACK E. JENKINS 9 Assistant United States Attorney Chief, Criminal Division 10 11 12 SCOTT M. GARRINGER Assistant United States Attorney 13 Deputy Chief, Criminal Division 14 IAN V. YANNIELLO Assistant United States Attorney 15 Deputy Chief, General Crimes Section 16 ALIX MCKENNA 17 Assistant United States Attorney General Crimes Section 18 19 20 21 22 23 24 25 26 27 28